

DECLARATION OF REBECCA CHAMBERS

I, REBECCA CHAMBERS, declare as follows:

(1) I am a member of the staff of the Church of Scientology of California and in that capacity am responsible for monitoring, as a representative of the Church, the litigation filed against Defendant Gerald Armstrong.

(2) On August 17 & 18, 1982 I attended the entirety of the deposition of Mr. Armstrong. I have been asked by my attorney, Mr. Lawrence E. Heller, to recall certain testimony given by Mr. Armstrong on the second day of his deposition (August 18, 1982) respecting how he acquired documents and materials from the Church archives. Mr. Heller explained to me that he needed my declaration recalling this testimony in that he would be moving to have a Temporary Restraining Order, which was previously denied, reconsidered and he would not have the August 18, 1982 deposition transcript ready for that reconsideration hearing.

(3) Of my own independent recollection, and by referring to my notes, taken at that deposition session, (attached hereto as Exhibit "A") I recall that Mr. Armstrong testified as follows:

(a) That about two weeks before he left his post as archivist, with full knowledge he was going to leave his post and without informing any members of the Church he copied thousands of documents from the archives and took both copies and originals from the Church complex;

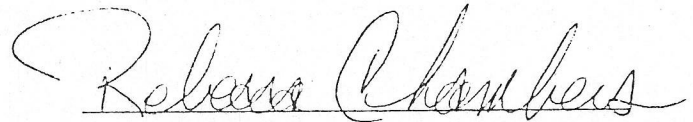
(b) He thereafter gave them to Omar V. Garrison, L. Ron Hubbard's biographer, though he had not asked for most of the material produced, Mr. Garrison having no idea, at that time, that Mr. Armstrong had left the Church; and

1 (c) Several weeks later he retrieved from Mr. Garrison
2 the documents he had supplied to Mr. Garrison. Armstrong testified
3 he then made copies of some of these documents and in some cases
4 kept the only original leaving no copy with Mr. Garrison or the
5 Church.

6 (4) My notes attached hereto supporting independent
7 recollection of the above-testimony as a perusal of those notes
8 shown.

9 Executed this 23rd day of August, 1982 at Santa Monica,
10 California.

11 I declare under penalty of perjury that the forgoing is
12 true and correct.

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15 REBECCA CHAMBERS, Declarant
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